

## **Important Privacy Notice**

Federal Rule of Civil Procedure 5.2 prohibits litigants in a non-habeas proceeding from submitting documents that contain personal information. Unless the Court orders otherwise, personal identifying information in Court filings must be limited as follows:

- Social security numbers, taxpayer-identification numbers, and financial **account numbers must include only the last four digits** (e.g., xxx-xx-1234)
- Birth dates must **include the year of birth only** (e.g., xx/xx/2000)
- Names of persons under the age of 18 must be indicated by **initials only** (e.g., A.B.)

You are responsible for protecting the privacy of this information in your filings. If your documents, including attachments, contain any information that does not comply with this rule, please black out that information before sending your documents to the Court.

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

Dirahn Dennis Gilliams

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Case Number 10-CV-1914

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*(In the space above enter the full name(s) of the plaintiff(s).)*

**- against -**

Universal Music Group

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Cash Money Records

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James Scheffer

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**COMPLAINT**

Jury Trial: ☐ Yes ☒ No

(check one)

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*(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)*

**I. Parties in this complaint:**

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	Dirahn Gilliams
	Street Address	2818 Ellendale Pl, Apt 1
	County, City	Los Angeles, Los Angeles
	State & Zip Code	California 90280
	Telephone Number	919-988-5663

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1                      Name Universal Music Group  
Street Address 2220 Colorado Avenue  
County, City Los Angeles, Santa Monica  
State & Zip Code California, 90404

Defendant No. 2                      Name Cash Money Records  
Street Address 20201 e Country Club Ln  
County, City Miami Dade, Miami  
State & Zip Code Florida 33167

Defendant No. 3                      Name James Scheffer  
Street Address \_\_\_\_\_  
County, City \_\_\_\_\_  
State & Zip Code \_\_\_\_\_

Defendant No. 4                      Name Dwayne Carter  
Street Address \_\_\_\_\_  
County, City \_\_\_\_\_  
State & Zip Code \_\_\_\_\_

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (*check all that apply*)  
☒ Federal Questions                      ☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? The digital government document fraud and conspiracy to commit fraud  
Background on unjust enrichment and copyright infringement  
\_\_\_\_\_

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship United States of America

Defendant(s) state(s) of citizenship United States of America

### III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? This was an internal fully planned out Incident that Universal Music along with Cash Money, Kevon Glickman, and James Scheffer devised with interaction from Previous Cash Money Affiliate, Nasir Fard

B. What date and approximate time did the events giving rise to your claim(s) occur? These events happened between June 2007 and September 2009

Throughout entire trial the Judge was extremely misled and given false testimony  
And dismissed the case with prejudice based on the defenses fraudulent actions

C. Facts: First I hired Kevon Glickman to help get placements of my works that seemed to have The most potential to his industry contacts. This was late 2006 At Respect Management. I paid him a total of \$600 for this and supplied a CD at first.

Being born in Camden, NJ had to seek professional music services over the bridge. Then throughout the rest of the time until late 2008 I sent works via the emails He provided to me which included Grinding Like Goon lyrics with Writin off Flo & Stuntin Aint Habit with link to Logo

It has come to my attention the following ensued: both works were shared with Music professionals including Major Figgas production. Starting in June 2007 Motown/Universal had my name listed as a writer for Get Like Me along with Registration of the work Get Like Me. It is common practice in the industry to run A test market before releasing works by or including new talent. This was done in November 2007 where there was a work called, "Git Down on the Ground" by Gille Da Kid which Included the stuttering chorus Writin off Flo on the work. This was a Philadelphia based song with Much Success as a test. Around this time Kevon Glickman saw fit to meet with James Scheffer in which conspiracizing some scheme to gain unjust enrichment from Plagiarizing and infringing upon my works. Their defense prior to the initial lawsuit was the same as during the lawsuit Deception and coverup about routes of access were tampered with by defense

I was in the Universal Music System since 2007 so both works were accessible(Get Like Me)

This was premeditated copyright infringement that had internal help from Universal Music Group/Rondor Publishing and Cash Money affiliates along with Bernard Resnick, Lavell Crump, Dwayne Carter, and their employees encumbered.

What  
happened  
to you?

Who did  
what?

Was  
anyone  
else  
involved?

Who else  
saw what  
happened?

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**IV. Injuries:**

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. \_\_\_\_\_

I have been harassed by many of James Scheffers affiliates along with further  
Gains being stolen by Kevon Glickman on works I purchased the rights to but  
Was never listed in the proper royalty society's databanks to receive profits  
From. My business along with the world now suffers from delays that my business  
was not able to contribute to inventions and conservation that would help sustain  
This planet.

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**V. Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

I am requesting the lesser and not the maximum penalty for this conspiracized  
Fraudulent act against the copyright office Federal court systems of Pennsylvania  
And American civilians. The value of the work, "Lollipop" by Lil Wayne, estimated  
profit percentage of 25% agreed to out of court or with Default Judgment.

This amount should be around \$10-12.5 million dollars

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**I declare under penalty of perjury that the foregoing is true and correct.**

Signed this 25 day of September, 2022.

Signature of Plaintiff   
Mailing Address 2755 Firestone Blvd unit B  
South Gate, Ca 90280  
  
Telephone Number 9199885663  
Fax Number (if you have one)   
E-mail Address Rawclause@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: \_\_\_\_\_  
Inmate Number \_\_\_\_\_